

AO 91 (Rev. 02/09) Criminal Complaint

UNITED STATES DISTRICT COURT JAN 29 2020

for the

David J. Bradley, Clerk

United States of America

Southern District of Texas

v.

Cristobal Benavidez

COB: US

YOB: 1966

&

Jose Guadalupe RAMIREZ-Regalado

COB: MX

YOB: 1972

Defendant

Case No.

M-20-0244-M

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

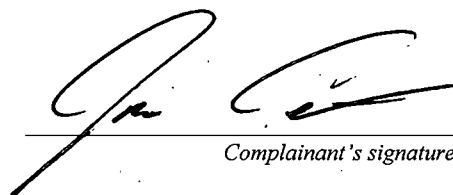
On or about the date of 01/28/2020 in the county of Hidalgo in the Southern District ofTexas, the defendant violated 8 U. S. C. § 1324

, an offense described as follows:

Knowingly and in reckless disregard of the fact that Jose Carlos BRUNO-Hidalgo and Wilbert MARTINEZ-Rodriguez both citizens and nationals of Mexico who had entered or remained in the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such alien in any place, including any building or means of transportation, to wit: residence in Edinburg Texas.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.Approved: AUSA LAURA GARCIA
J-J-


Complainant's signature

Jose G. Cervantes Jr. HSI Task Force Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

1/29/2020

City and state:

McAllen, Texas



Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On January 27, 2020 United States Border Patrol Agents received information regarding an active stash house in Edinburg, Texas.

On January 28, 2020, US Border Patrol Agents Field Intelligence Team, conducted surveillance of the stash house in Edinburg, Texas, where they observed a Maroon truck arrive at the main gate, enter the property and park next to the house. Agents then observed three individuals run from the truck and enter the house.

The truck was followed as it left the house, where agents observed it as it stopped at several business. A traffic stop was conducted on the Maroon truck. Agents approached identifying the driver as Jose Guadalupe Ramirez-Regalado. Ramirez claimed he had legal status but did not produce any documents. Ramirez told agents he was coming from a house where he had just dropped off three (3) illegal aliens.

Agents watching the house observed a Hispanic male exit the home, enter a Gray SUV, open the gate and drive away. Agents contacted Hidalgo County Constables Office (HCCO) Pct. 4 requesting assistance to follow the vehicle. Constables following the SUV conducted a traffic stop.

Agents approached identifying the driver as Cristobal Benavidez. Agents read Benavidez his Miranda Rights which he acknowledged he understood and subsequently waived in writing.

Agents asked Benavidez what type of activity was going on at the house he had left. Benavidez told agents someone had just dropped off three (3) people to fix his restroom and one (1) female to clean his house. Benavidez claimed to be the home owner and gave agents consent to search the house.

Agents with Benavidez returned to the house, to conduct the consensual search. Agents discovered five (5) undocumented aliens in the home. The aliens, Benavidez and Ramirez were transported to the border patrol station for questioning and processing.

Benavidez admitted to harboring illegal aliens at his home and that he was paid to do so.

Ramirez admitted to dropping off illegal aliens at the home and that he was paid to do so.

Material witness Mexican National Joe Carlos Bruno-Hidalgo told agents he had been smuggled into the United States, turned over to Ramirez and transported to the home. Bruno claims he was to pay smugglers \$ 1,500 USD.

Material witness Mexican National Wilbert Martinez-Rodriguez told agents he had also been smuggled into the United, turned over to Ramirez and transported to the home. Martinez was able to identify both Benavidez and Ramirez. The smuggling fees for him and his wife were to be \$15,000.00 USD, stating he had already paid smugglers \$8,000.00 USD.